UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:)
)
CIRCUIT CITY STORES, INC. et al.) Chapter 11
) Case No. 08-35653-KRH
Debtors.)
) Jointly Administered
) Judge Kevin R. Huennekens
)
	<u>)</u>

MOTION TO APPEAR PRO HAC VICE PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1 (E) (2)

Linda D. Regenhardt ("Movant"), a member in good standing of the bar of, and admitted to practice in the Commonwealth of Virginia, and admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia, (this "Court"), hereby moves the Court, pursuant to Local Bankruptcy Rule 2090-1 (E), to enter an Order authorizing Malani J. Cademartori ("Ms. Cademartori"), an attorney with the law firm of Sheppard Mullin Richter & Hampton, LLP, to appear *pro hac vice* in the above captioned bankruptcy cases before this Court to represent American Computer Development, Inc. ("ACDI") and in support of this Motion, the Movant states as follows:

1. Ms. Cademartori is a member in good standing of the State Bar of New York and is admitted to practice before the United States District Court for the Southern District and the Eastern District of New York and the United States Bankruptcy Court. There are no disciplinary proceedings pending against Ms. Cademartori in any jurisdiction in which she is admitted to practice.

- 2. Movant requests that this Court authorize Ms. Cademartori to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in these chapter 11 cases (and related matters or adversary proceedings) on behalf of ACDI.
- 3. Movant shall serve as co-counsel with Ms. Cademartori in these chapter 11 cases (and related proceedings).

Waiver of Memorandum of Law

4. Pursuant to Local Bankruptcy Rule 9013-(G) and because there are no novel issues of law presented in this Motion, the Movant requests that this Court waive the requirement that all motions be accompanied by a written memorandum of law.

No Prior Request

5. No prior request for the relief sought herein has been made to this Court in these bankruptcy cases or to any other court.

WHEREFORE, Movant respectfully requests that this Court enter an order in substantially the same form as Exhibit A attached hereto (i) authorizing Malani J. Cademartori to appear *pro hac vice* in these bankruptcy cases and (ii) granting such further relief as is just.

Dated: January 26, 2009 Respectfully submitted,

GARY & REGENHARDT, PLLC

By: /s/ Linda D. Regenhardt Linda D. Regenhardt (VA Bar No. 27455) 8500 Leesburg Pike, Suite 7000 Vienna, Virginia 22182-2409

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Development, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of January, 2009, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Bankruptcy Court for the Eastern District of Virginia, Richmond Division, using the CM/ECF system, which thereby caused the above to be served electronically on all registered users of the ECF system that have filed notices of appearance in this matter, and was mailed, by U.S. mail, first class, postage prepaid, to all persons appearing below:

Robert B. Van Arsdale, Esq. Office of the United States Trustee 701 East Broad St., Suite 4304 Richmond, VA 23219 Assistant United States Trustee

Dion W. Hayes, Esq.
Joseph S. Sheerin, Esq.
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Daniel F. Blanks, Esq. Douglas M. Foley, Esq. McGuire Woods LLP 9000 World Trade Center 101 W. Main Street Norfolk, VA 23510 Counsel for the Debtors

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/s/ Linda D. Regenhardt Linda D. Regenhardt (VA Bar No. 27455)